Case	2:25-cv-01621-WLH-SK Docume	ent 21-1 #:171	Filed 05/16/25	Page 1 of 2 Page ID
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1.5	FOR THE CENTRAL DISTRICT OF CALIFORNIA WESTERN DIVISION			
15	W	ESTER	N DIVISION	
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	RUBEN FLORES,	ESTER)		5-cv-01621-WLH-SK
16	RUBEN FLORES,	ESTER	Case No.: 2:25	
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16 17 18	RUBEN FLORES, Plaintiff, vs.	'ESTER	Case No.: 2:25 DECLARAT RUBINOV IN DEFENDAN	ION OF MEIR N OPPOSITION OF T ASSUREHIRE,
16 17 18 19	RUBEN FLORES, Plaintiff,	ESTER)	Case No.: 2:25 DECLARAT RUBINOV IN DEFENDAN INC.'S MOT PURSUANT	ION OF MEIR N OPPOSITION OF
16 17 18 19 20	RUBEN FLORES, Plaintiff, vs.	ESTER)	Case No.: 2:25 DECLARAT RUBINOV IN DEFENDAN INC.'S MOT	ION OF MEIR N OPPOSITION OF T ASSUREHIRE, ION TO DISMISS
16 17 18 19 20 21	RUBEN FLORES, Plaintiff, vs. ASSUREHIRE, INC.,	ESTER)	Case No.: 2:25 DECLARAT RUBINOV IN DEFENDAN INC.'S MOT PURSUANT 12(b)(6) Hearing Date:	ION OF MEIR N OPPOSITION OF T ASSUREHIRE, ION TO DISMISS TO FED. R. CIV. P. June 6, 2025
16 17 18 19 20 21 22	RUBEN FLORES, Plaintiff, vs. ASSUREHIRE, INC.,	ESTER	Case No.: 2:25 DECLARAT RUBINOV IN DEFENDAN INC.'S MOT PURSUANT 12(b)(6) Hearing Date: Hearing Time	ION OF MEIR N OPPOSITION OF T ASSUREHIRE, ION TO DISMISS TO FED. R. CIV. P. June 6, 2025 : 1:30 p.m.
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16 17 18 19 20 21 22 23 24 25 26	RUBEN FLORES, Plaintiff, vs. ASSUREHIRE, INC.,	ESTER	Case No.: 2:25 DECLARAT RUBINOV IN DEFENDAN INC.'S MOT PURSUANT 12(b)(6) Hearing Date: Hearing Time Courtroom: 91 Complaint file	ION OF MEIR N OPPOSITION OF T ASSUREHIRE, ION TO DISMISS TO FED. R. CIV. P. June 6, 2025 : 1:30 p.m. B
16 17 18 19 20 21 22 23 24 25 26 27	RUBEN FLORES, Plaintiff, vs. ASSUREHIRE, INC., Defendant.		Case No.: 2:25 DECLARAT RUBINOV IN DEFENDAN INC.'S MOT PURSUANT 12(b)(6) Hearing Date: Hearing Time Courtroom: 91 Complaint file	ION OF MEIR N OPPOSITION OF T ASSUREHIRE, ION TO DISMISS TO FED. R. CIV. P. June 6, 2025 : 1:30 p.m. B ed: February 26, 2025 ot set

1	Meir Rubinov, an attorney duly admitted pro hac vice to practice in this				
2	District, hereby declares as follows:				
3					
4	1. I am associated with the law firm of Consumer Attorneys, PLLC,				
5	counsel for Plaintiff in this action. I am actively involved in the prosecution of this				
6 7	action, and familiar with its proceedings.				
8	2. I offer this declaration in opposition to Defendant AssureHire Inc.'s				
9	motion to dismiss for the limited purpose of introducing documents that are cited in				
10					
11	the accompanying memorandum of law in opposition to the motion to dismiss.				
12	3. Exhibit 1 is the clean version of Plaintiff's Proposed Amended				
13	Complaint for Violations of the Fair Credit Reporting Act (the "PAC").				
14 15	4. Exhibit 2 is a redline comparing the operative complaint in this matter				
16	(ECF No. 1) with the PAC.				
17	I declare under penalty of perjury that the foregoing is true and correct.				
18					
19					
20	/s/ Meir Rubinov				
21	Meir Rubinov				
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23					
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